

REMARKS

Applicants thank the Examiner for noting informalities in claims 19, 24 and 32 of this application. Applicants have corrected these informalities by the foregoing amendments to claims 19, 24 and 32. Claim 33 has been amended to clarify the claimed subject matter.

In the office action, claims 1-43 were rejected under 35 U.S.C. § 102(e) as allegedly being anticipated by Application Publication No. 2001/0000962 of Rajan (hereinafter "Rajan").

Applicants respectfully traverse the rejections of record, and further submit that claims 1-43 as amended are in condition for allowance.

Rejections under 35 U.S.C. § 102(e) in view of Rajan

Claims 1-43 were rejected under 35 U.S.C. § 102(e) as allegedly anticipated by Rajan.

Independent claim 1 is directed to a system for generating a description record from multimedia information, comprising, *inter alia*:

a computer processor, coupled to said at least one multimedia information input interface, receiving said multimedia information therefrom, processing said multimedia information by performing object extraction processing to generate multimedia object descriptions from said multimedia information, and processing said generated multimedia object descriptions by object hierarchy processing to generate multimedia object hierarchy descriptions indicative of an organization of said object descriptions, wherein at least one description record including said multimedia object descriptions and said multimedia object hierarchy descriptions is generated for content embedded within said multimedia information

Independent claim 17 includes similar limitations in the context of a method claim.

Rajan is directed to a method and apparatus for composing and presenting multimedia programs using the MPEG-4 standard at a multimedia terminal, including an architecture wherein the composition of a multimedia scene and its presentation are processed by two different entities – a "composition engine" and a "presentation engine."

See Rajan, ¶ 0002.

Rajan does not disclose or suggest at least several features of the claimed invention, including “processing said multimedia information by performing object extraction processing to generate multimedia object descriptions.” On p. 3 of the Office Action, ¶ 0042 is cited as allegedly disclosing this element – however, ¶ 0042 is devoid of any discussion of object extraction even generally. Indeed, the object extraction of the present invention is a complex process defined with reference to another patent application, U.S. Patent Application Serial No. 09/405,555, filed September 24, 1998, entitled “An Active System and Algorithm for Semantic Video Object Segmentation,” the contents of which are incorporated by reference into the specification of the present application. Rajan, ¶ 0042, does not disclose or even remotely suggest this claimed object extraction feature *in toto*, or even generally.

Likewise, ¶ 0043 is cited on p. 3 of the Office Action as allegedly disclosing the claimed feature of “processing said generated multimedia object descriptions by object hierarchy processing to generate multimedia object hierarchy.” However, while ¶ 0043 generally discloses that an MPEG-4 scene follows a hierarchical structure, it nowhere indicates that multimedia objection descriptions, which are generated by, e.g., performing object extraction, are processed by object hierarchy processing.

Accordingly, because Rajan fails to disclose or suggest at least these claimed features, this reference fails to anticipate independent claims 1 and 17. Applicants respectfully submit that these claims are in condition for allowance. Additionally, because all depending claims 2-16 and 18-32 contain the foregoing limitations through dependency from claims 1 and 17, Applicants respectfully submit that these claims are also in condition for allowance.

Claims 3, 7, 19 and 23 are patentable for the additional reason that they include limitations of “image segmentation” and “feature extraction.” On p. 3 of the Office Action, it is asserted that ¶ 0045 describe these features. In fact, it is asserted in the Office Action that the limitation of “feature extraction” is disclosed by the reference to “pitch of a sound” in ¶ 0045. This is plainly incorrect. As noted above, the object

extraction of the present invention is defined with reference to another patent application, U.S. Patent Application Serial No. 09/405,555, filed September 24, 1998, entitled "An Active System and Algorithm for Semantic Video Object Segmentation," the contents of which are incorporated into the specification of the present application. This claimed feature cannot possibly be disclosed or suggested by simple reference in Rajan to "pitch of a sound." *See* Office Action, p. 3.

Independent claim 33 as amended is directed to a computer readable medium with at least one multimedia description record describing multimedia content for corresponding multimedia information, the description record comprising, *inter alia*, object descriptions, generated by performing object extraction processing. As discussed at length above, Rajan fails to disclose or even remotely suggest at least the feature of object descriptions generated by performing object extraction processing. Accordingly, because Rajan fails to disclose or suggest at least these claimed features, this reference fails to anticipate independent claim 33 as amended. Applicants respectfully submit that this claim is in condition for allowance. Additionally, because all depending claims 34-43 contain the foregoing limitations through dependency, Applicants respectfully submit that these claims are also in condition for allowance.

CONCLUSION

In view of the foregoing amendment and remarks, favorable consideration and allowance of claims 1-43 as amended are respectfully solicited. In the event that the application is not deemed in condition for allowance, the examiner is invited to contact the undersigned in an effort to advance the prosecution of this application.

Respectfully submitted,



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